

April 30, 2020

[Name, Degree
Title
Company
Address
City, ST Zip]

Dear Dr. :

On behalf of the more than 7,700 U.S. rheumatologists and rheumatology health professionals represented by the American College of Rheumatology (ACR), I am writing to you regarding coverage for telehealth services and continued access to hydroxychloroquine for patients with rheumatic diseases during the COVID-19 pandemic.

Access to hydroxychloroquine

The ACR has received numerous reports of insurance companies or pharmacy benefit managers (PBMs) initiating new prior authorization requirements or otherwise restricting access to hydroxychloroquine for patients already established on therapy. While we understand that this drug is under investigation as a potential treatment for the novel coronavirus, it is also a mainstay of treatment for patients with certain rheumatic diseases and supplies must be appropriately allocated for all patients who need it. Given the current strain on practices as a result of the global pandemic, we request that [Company] ensure continued access for patients already on hydroxychloroquine without introducing new prior authorization requirements which can cause interruptions in therapy and would create further administrative burden.

Telehealth

On behalf of all ACR members, we greatly appreciate [Company] swift action to expand access to telehealth in response to the COVID-19 pandemic. These options are particularly important for rheumatology patients because the majority are immunocompromised and may face greater health risks if exposed to the virus that causes COVID-19. To limit the spread of disease and help flatten the curve, many rheumatologists are now utilizing telehealth. However, reimbursement for telehealth visits varies widely between commercial insurers. Due to these challenging circumstances and importance of maintaining social distancing, we encourage you to ensure parity in reimbursement levels with a regular office visit. In addition, as many patients do not have video-capable devices and/or adequate internet or cellular coverage to conduct an audiovisual visit, we also ask that you follow the precedent recently set by CMS and establish parity for audio-only visits.

In addition, rheumatologists are encountering significant variation in coding guidelines among insurers, particularly with regard to place of service (POS) and modifier requirements. While we understand that some of this variation may be due to insurer system limitations, it has nonetheless resulted in a high level of confusion for practices trying to comply with variable requirements from insurer to insurer. To avoid this confusion and ensure timely payment, the ACR strongly encourages all commercial insurers to adopt uniform coding guidelines for all

telehealth visits, in line with CMS guidelines (POS-11 and a modifier -95, no GT or GQ codes). To ensure payment parity and limit further confusion at this time, these codes should be used for both audiovisual and audio-only visits.

As we consider the future of rheumatology after the COVID-19 pandemic subsides, we anticipate that some patients will prefer to continue receiving care via telehealth. Initial feedback indicates that patients are pleased with the convenience of telehealth, particularly for routine follow-up visits and among those who would otherwise travel a great distance to access care. The ACR believes if [Company] continues to provide payment parity for telehealth, including in-home evaluations after this crisis is over, we may be able to enhance the overall quality of care by providing more regular interactions and preventing gaps in care that occur when patients can't travel or lack time for in-office visits. We are interested in engaging with you to discuss the post-COVID healthcare landscape, particularly as it pertains to rheumatology and opportunities to improve the value of care our providers offer to [Company] and its members after the public health emergency.

We appreciate your review of these concerns and all that [Company] is doing to support providers and patients during the COVID-19 health emergency. For more information or to schedule a call, please contact Meredith Strozier, ACR Director of Practice Advocacy at mstrozier@rheumatology.org or (404)633-3777.

Sincerely,

Chris Phillips, MD
Chair, ACR Insurance Subcommittee